

JUL 25 '24 PM3:34
RCVD - USDC FLD SC

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

Charles Gene Butler
Phillip Mitchell Butler

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

Edisto Electric Cooperative Inc
Daniel Eubank
James K. Still

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. _____
(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No
(check one)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

7800 Farragut St.
Hollywood Fl. 33024

Atten

July 31, 2024

PLEASE USE ALSO FOR
CONTACT.

Name

Street Address

City and County

State and Zip Code

Telephone Number

Charles Butler/Phillip Butler
299 Fox Paw Ct.
Branchville, Orangeburg
SC 29432
954-292-1412

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name

Job or Title
(if known)

Street Address

City and County

State and Zip Code

Telephone Number

Edisto Electric Cooperative Inc.

P.O. Box 547

Bamberg

SC 29003-0547

800-433-3292

Defendant No. 2

Name

Job or Title
(if known)

Street Address

City and County

State and Zip Code

Telephone Number

DAWIAL EUBANK
MANAGER

Defendant No. 3

Name

JAMES K. STILL

Job or Title SUPERVISOR
 (if known)
 Street Address _____
 City and County _____
 State and Zip Code _____
 Telephone Number _____

Defendant No. 4

Name _____
 Job or Title _____
 (if known) ✓
 Street Address _____
 City and County _____
 State and Zip Code _____
 Telephone Number _____

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (*check all that apply*)

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

15 US code 16930-1
The Civil Rights Act of 1964
15 U.S. Code § 1666 / 18 US Code § 8

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Charles B. Butler, is a citizen of the State of (name) South Carolina

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) DANIAL EUBANK, is a citizen of the State of (name) S.C.. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) Edisto Electric, is incorporated under the laws of the State of (name) S.C., and has its principal place of business in the State of (name) S.C.. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

The Amount will Exceed because the length of time I
held Account and fact that Employees put customer's
under Duress by Denying Services until they Sign

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

see attached

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

We Would like to be reimbursed for all the funds we
were made to pay and to have our remittance honored
without prejudice and any right given under Duress removed
and to be reimbursed for the lost fish \$16,100, plants \$2500.00.
pain and suffering, mental anguish, \$3,000,000. At the hands
of Edisto Electric employees! To be treated fairly and
honestly.

We were made against our will to agree to give Edisto Electric rights for services ,we had no Heat ! ,no running water ! ,no lights ! we were using a Porta party ! in the middle of the night, no way to cook or store food and it was very cold at night. We needed power to operate our equipment in the greenhouse so that we could grow as new farmers . We were charged additional fees even though the funds for the account was covered by funds generated by my social. Mr. Still,James k . on or around 4/21 started the negative encounter by making us wait for over 5 or more months in this stressful situation despite the fact that we were already cleared by D-heck the local building department for electric service on 4/21 . His Supervisor Mr. Eubank,Daniel came up with the idea of me signing to give them the right to run their line on our land instead of using the easement which was given and no service until this is done ! I pleaded with my family for their help even though they were against it they wanted to help us. We noticed not long after the service started that our bill was higher than all our neighbors and continue to rise at a unrealistic rate ! When they put in new meters, Case and point we had finished our growing season about two months earlier no extra lightning or air conditioning equipment being used but the bill continue to rise to the point I had to seek the help of the government before anything could be done our service was tuned off killing a little more than three hundred fish and lost 50 plants. I did submit payment in the form of a remittance which was not honored my service is still off to the greenhouse to this day.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 7-25, 2024

Signature of Plaintiff

Printed Name of Plaintiff


Charles Gene Butler

B. For Attorneys

Date of signing: _____, 20__.

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Telephone Number

E-mail Address

